

KELLEY DRYE & WARREN LLP

A LIMITED LIABILITY PARTNERSHIP

October 22, 2024

The Honorable Vernon S. Broderick
 Thurgood Marshall United States Courthouse
 40 Foley Square
 New York, NY 10007

**APPLICATION GRANTED
 SO ORDERED *Vernon S. Broderick***
**VERNON S. BRODERICK
 U.S.D.J.**

Date: October 23, 2024

Re: *The Nielsen Company (US), LLC v. TVSquared Ltd.*, C.A. No. 1:23-cv-01581-VSB-SN

Dear Judge Broderick:

Plaintiff The Nielsen Company (US), LLC, (“Nielsen”) and Defendant TV Squared Ltd. (“TVSquared”) respectfully submit this joint letter-motion pursuant to Your Honor’s Individual Rules & Practices in Civil Cases to request to extend the stay in this case for an additional eighty (80) days, and to extend all deadlines in the Scheduling Order as shown below. The parties agree that the stay will apply to all interim deadlines, including the service of and responses and objections to written discovery. This is the parties’ second request to extend an existing stay in the case, and sixth request for an extension of time. See Dkt. 135, 159, 171, 186, 191. The court granted the previous five requests. Dkt. 137-138, 160-161, 172-173, 189-190. In support of this letter-motion, the parties provide the following specific reasons for the stay and extension requests:

The parties are continuing to work towards a mutually agreeable resolution to this lawsuit. Nielsen and TVSquared have exchanged a draft Letter of Intent regarding possible terms, with specific milestone dates included in the letter to assist in progressing towards an agreement. While the parties are diligently working to progress towards a resolution, including technical proof-of-concept work, the parties currently do not have sufficient time to complete their technical work and continue their negotiations without incurring substantial costs associated with the close of fact discovery and expert reports. The parties therefore request that the Court extend the existing stay in the case for an additional 80 days, and further permit the parties to extend all remaining deadlines by approximately 80 days to allow for additional time to hold further discussions in lieu of incurring further costs associated with the litigation.

A list of existing deadlines in the procedural schedule, along with the proposed adjusted deadlines, is included below. A proposed order reflecting these revised dates is attached hereto as Exhibit A.

ITEM	CURRENT DATE	PROPOSED DATE
Deadline to serve any interrogatories or requests for admission	January 10, 2025	April 1, 2025
Close of fact discovery	February 10, 2025	May 2, 2025
Opening expert reports by party with burden of proof	March 28, 2025	June 17, 2025
Responsive expert reports by party without burden of proof	May 2, 2025	July 22, 2025

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ITEM	CURRENT DATE	PROPOSED DATE
Close of expert discovery	June 20, 2025	September 9, 2025
Joint letter to court regarding dispositive motions	July 11, 2025	September 30, 2025
Telephonic post-discovery teleconference	July 25, 2025	October 14, 2025

Respectfully submitted,

/s/ Steven Yovits

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